



## U.S. Department of Justice

---

United States Attorney  
Western District of Tennessee  
800 Federal Office Building  
Memphis, TN 38103  
Telephone  
(901)544-4231  
Fax  
(901)544-4230

July 12, 2012

**David Bell**

FEDERAL PUBLIC DEFENDER- Memphis  
200 Jefferson Ave.  
Ste. 200  
Memphis, TN 38103

**Scottie O. Wilkes**

LAW OFFICE OF SCOTTIE O. WILKES  
301 Washington Avenue  
Ste. 202  
Memphis, TN 38103

**Lauren Pasley-Ward**

LAW OFFICE OF LAUREN PASLEY-WARD  
242 Poplar Avenue  
Memphis, TN 38103

**Jeff C. Woods**

THE WAGERMAN LAW FIRM  
200 Jefferson Avenue, Suite 1313  
Memphis, TN 38103

**Juni S. Ganguli**

LAW OFFICES OF JUNI GANGULI  
One Commerce Square  
40 S. Main Ave.  
Ste. 1540  
Memphis, TN 38103

**Robert L. Parris**

ATTORNEY AT LAW  
8 South Third Street  
4th Floor  
Memphis, TN 38103

**Barry J. McWhirter**

MCWHIRTER & IRVINE, PLLC  
62 N. Main Street  
Suite 401  
Memphis, TN 38103

**Wendy Nicole Villafana**

VILLAFANA LAW  
5119 Summer Avenue  
Suite 102  
Memphis, TN 38122

United States v. Anthony Nixon, Eric Nixon, Derrick Dawson, Markee Barbee,  
David Willis, Keithian Helm, James Whitelow, and Esiquiel Sanchez,

Cr. No. 12-20081

Dear Sirs:

Pursuant to your request for discovery and my continuing obligation to provide it I

have included in this envelope 1 disc title "Nixon et al Discovery III" that contains the following contents:

1. Folder labeled "Warrant Execution Photos" containing the following files:
  - a. Folder labeled "238 Williams Street" containing 72 photos of people and evidence recovered at that residence concerning the execution of arrest and search warrants on Mr. Derrick Dawson;
  - b. Folder labeled "277 Washington" containing 5 photos of evidence recovered at that business belonging to Mr. Anthony Nixon;
  - c. Folder labeled "375 Haley Ave." containing 12 photos of evidence and people found during the execution of arrest and search warrants at that residence where Mr. Anthony Nixon lived;
  - d. Folder labeled "915 Maple Hill Circle" containing 12 photos of people and evidence seized during the execution of arrest warrant for David Willis at that residence;
  - e. Folder labeled "1310 Junius Lee Road" containing 13 photos of evidence seized during the execution of arrest warrant for Mr. Lafredric Jones;
  - f. Folder labeled "6375 Hwy 51 N" with a sub-folder named "SW Photos" that contains 48 photos of people and evidence recovered during the execution of an arrest warrant for Markee Barbee.
2. A PDF file named "Bonds and Allen TX arrest" containing 18 pages regarding the stop, arrest and recovery of approximately 1.5 kilos of cocaine from Mr. Shelton Bonds and Mr. Kendrick Allen in Rockwall, Texas.
3. A PDF file named "Lab Reports 1" containing 63 pages of copies of lab reports of narcotics seized in this case including the 1.5 kilograms seized from Mr. Bonds and Mr. Allen in Texas mentioned above.
4. A PDF file named "Redacted DEA 6's II" containing 153 pages of copies of the DEA reports generated in this case. It should be noted that many of these reports have previously been provided on disc labeled "Discovery II." These reports are also now followed by their relevant lab reports where

narcotics were seized as a result of arrest and/or search warrants being executed.

5. Please be advised that I recognize my continuing obligation to provide you with all discoverable materials. That said, the materials included in this disc, along with what you were previously provided, should fairly complete discovery of all materials currently available. The only remaining material I anticipate providing, subject to the unexpected miscellaneous items you may bring to my attention, will be discovery related to the chemists' *curriculum vitae*, and the like, should a trial become necessary.
6. If, upon receipt, you do not find an item referenced as being enclosed with this letter, or if you find that there is something that has not been included that you believe should have been included, please contact me immediately. If the information contained on these discs is corrupted or otherwise inaccessible please advise me as soon as possible so that appropriate measures may be taken to correct the problem.

Sincerely,

EDWARD L STANTON, III  
UNITED STATES ATTORNEY

By: s/ W. Chris Scruggs  
W. Chris Scruggs  
Special Assistant United States Attorney